

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ROCKWELL AUTOMATION
TECHNOLOGIES, INC.,

Plaintiff,

v.

SECURE CROSSING RESEARCH
AND DEVELOPMENT INC.,

Defendant.

Case No. 2:12-cv-10274-GCS-MKM

Honorable George Caram Steeh

Referred to Honorable Mona K
Majzoub

[Oral Argument Requested]

**SECOND DECLARATION OF LISA SCHAPIRA IN SUPPORT ROCKWELL
AUTOMATION TECHNOLOGIES, INC'S MOTION TO COMPEL DISCOVERY**

I, Lisa Schapira, declare as follows:

1. I am an associate with the law firm of Chadbourne & Parke LLP, counsel to Plaintiff Rockwell Automation Technologies, Inc. ("Rockwell") in this action. I make this declaration based on personal knowledge and in support of Rockwell's Motion to Compel Discovery from defendant Secure Crossing Research and Development Inc.

2. Attached hereto as Exhibit 1 is a true and correct copy of Secure Crossing's Response to Plaintiff's First Set of Requests for the Production of Documents served on July 19, 2012.

3. Attached hereto as Exhibit 2 is a true and correct copy of an email exchange occurring between Counsel for Rockwell and Counsel for Secure Crossing on July 26, 2012.

4. Attached hereto as Exhibit 3 is a true and correct copy of an email exchange occurring between Counsel for Rockwell and Counsel for Secure Crossing on June 14, 2012.

5. Attached hereto as Exhibit 4 is a true and correct copy of Secure Crossing's Response to Plaintiff's First Set of Interrogatories served on July 24, 2012.

I declare under the penalty of perjury under the law of the United States that the foregoing is true and correct.

Dated: July 30, 2012

/s/ Lisa Schapira
Lisa Schapira
Chadbourne & Parke LLP
30 Rockefeller Plaza
New York, NY 10112
Tel.: (212) 408-5100
Fax: (212) 541-5369
Email: ptanck@chadbourne.com

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of July, 2012 a copy of the foregoing was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

Dated: July 30, 2012

/s/ Lisa Schapira

Lisa Schapira
CHADBOURNE & PARKE LLP
30 Rockefeller Plaza
New York, NY 10112
Tel.: (212) 408-5100
Fax: (212) 541-5369
Email: lschapira@chadbourne.com

**ATTORNEY FOR PLAINTIFF
ROCKWELL AUTOMATION TECHNOLOGIES, INC.**